

1 John H. Podesta
Nevada Bar No. 7487
2 **WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP**
300 South 4th Street, Ste. 1100
3 Las Vegas, NV 89101
Tel.: (415) 433-0990
4 Fax: (415) 434-1370
john.podesta@wilsonelser.com

5 Attorneys for Third Party Defendant,
6 PROBUILDERS SPECIALTY INSURANCE
COMPANY, RRG
7

8 UNITED STATES DISTRICT COURT
9
10 DISTRICT OF NEVADA

11 CENTEX HOMES, a Nevada general
12 partnership,

13 Plaintiff,

14 vs.

15 ST. PAUL FIRE AND MARINE
16 INSURANCE COMPANY, a Connecticut
17 corporation; EVEREST NATIONAL
18 INSURANCE COMPANY, a Delaware
19 corporation; INTERSTATE FIRE &
CASUALTY COMPANY, an Illinois
20 corporation; LEXINGTON INSURANCE
COMPANY, a Delaware corporation;
21 FEDERAL INSURANCE COMPANY, an
Indiana corporation,

22 Defendants.

23 ST. PAUL FIRE AND MARINE
INSURANCE COMPANY,

24 Third Party Plaintiff,

25 vs.

26 UNDERWRITERS AT LLOYDS LONDON;
27 PROBUILDERS SPECIALTY INSURANCE
COMPANY, RRG; NEW HAMPSHIRE
INSURANCE COMPANY; FIRST
SPECIALTY INSURANCE COMPANY;

CASE NO. 2:17-CV-02407-JAD-VCF

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME TO FILE
A RESPONSIVE PLEADING TO ST.
PAUL FIRE AND MARINE
INSURANCE COMPANY'S THIRD
PARTY COMPLAINT [SECOND
REQUEST]**

Action Filed:
Trial Date:

Sept. 14, 2017
None Set

1 ARCH SPECIALTY INSURANCE
2 COMPANY; IRONSHORE SPECIALTY
3 INSURANCE COMPANY; ROCKHILL
4 INSURANCE COMPANY; and FIREMAN'S
5 FUND INSURANCE COMPANY,

6 Third Party Defendants.

7
8 AND RELATED CROSS-ACTION.
9
10

11 Defendant and Third Party Plaintiff ST. PAUL FIRE AND MARINE INSURANCE COMPANY ("St.
12 Paul") and Third Party Defendant PROBUILDERS SPECIALTY INSURANCE COMPANY RRG, A RISK
13 RETENTION GROUP ("Probuilders") hereby submit the following Stipulation Extending Time to File a
14 Responsive Pleading to St. Paul's Third Party Complaint in the above-captioned action

15 WHEREAS, Centex Homes ("Centex") filed a Complaint on or about September 14, 2017, in the
16 United States District Court, District of Nevada as Case Number 2:17-cv-02407;

17 WHEREAS, on or about December 21, 2017, St. Paul served Probuilders with the Third-Party
18 Complaint through the State of Nevada Department of Business and Industry, Division of Insurance;

19 WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), ProBuilders' original deadline
20 to respond to the Third-Party Complaint was January 11, 2018;

21 WHEREAS, St. Paul and Probuilders previously stipulated to extend the time for Probuilders to file a
22 responsive pleading to St. Paul's Third-Party Complaint until February 2, 2018, which the court ordered on
23 January 26, 2018, in part to allow the parties an opportunity to attempt to informally resolve the claims against
24 Probuilders set forth in the Third Party Complaint;

25 WHEREAS, Probuilders and St Paul need additional time to complete their discussions regarding
26 informal resolution, and for that reason have agreed to further continue Probuilders' date to respond to the
27 Third Party Complaint by another two weeks, until February 22, 2018;

28 ///

///

///

1 NOW, THEREFORE, St. Paul and Probuilders, by and through their respective counsel, hereby
2 stipulate to allow for a further extension of time for Probuilders to file a responsive pleading to St. Paul's
3 Third Party Complaint until February 22, 2018.

4 DATED: January 31, 2018

MORALES FIERRO & REEVES

5
6 By: s/s Ramiro Morales
RAMIRO MORALES, ESQ.
7 rmares@mfrlegal.com
Attorneys for Defendant and Third Party Plaintiff
8 ST. PAUL FIRE and MARINE INSURANCE
COMPANY
9

10 DATED: January 31, 2018

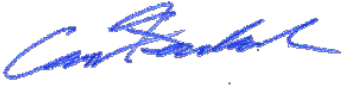
**WILSON ELSEER MOSKOWITZ EDELMAN &
DICKER LLP**

11
12
13 By: s/s John H. Podesta
JOHN H. PODESTA, ESQ.
14 john.podesta@wilsonelser.com
Attorneys for Third Party Defendants
15 PROBUILDERS SPECIALTY INSURANCE
COMPANY,RRG
16

17 DATED: 2-1-2018

ORDER

IT IS SO ORDERED.

18
19
20 
21 UNITED STATES ~~DISTRICT~~ JUDGE
22 Magistrate
23
24
25
26
27
28